

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA)
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)
BERK ERATAY)

Case No. 5:22-cr-00058-gwc-2

MOTION FOR RELEASE FROM CUSTODY

NOW COMES, the Defendant, by and through his attorney Robert W. Katims, and hereby requests that this Court release him from Detention. In support of this *Motion*, Defendant states the following:

1. After a hearing in the District of Nevada, Defendant was detained on June 3, 2022.
2. Defendant subsequently waived his identity hearing and agreed to removal to the District of Vermont.
3. Defendant is now prepared to supplement his original Motion for Pretrial Release (which he incorporates by reference) with the additional condition of a 24-hour curfew, supervised by Mr. Kaya and/or Mr. Kaya's wife, Deanna Phillips-Kaya.
4. Thus, if release were to occur, Defendant would secure housing in Vermont with the assistance of Mr. Kaya, be subject to GPS monitoring and maintain a 24-hour supervised curfew.
9. The Government opposes this request.

WHEREFORE, Defendant respectfully requests that the Court schedule a hearing on his request for release.

DATED at Burlington, Vermont this 16th day of August, 2022.

BERK ERATAY

By: /s/ Robert W. Katims
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